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Attorneys for Non-Parties
SANDSTONE GROUP, LLC,
TYTO LIDAR, LLC, and
OGNEN STOJANOVSKI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ADRIAN J. SAWYER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION TO
WAYMO'S MOTION TO COMPEL
FURTHER DEPOSITIONS AND
INTERROGATORIES (DKT. 1830)**

1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone
4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the
5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Defendants' Administrative Motion to File
7 Under Seal Their Opposition to Waymo's Motion to Compel Further Depositions and
8 Interrogatories (Dkt. 1830). I have reviewed the Administrative Motion to File Under Seal (the
9 "Administrative Motion"), together with Defendants' Opposition to Waymo's Motion to Compel
10 Further Depositions and Interrogatories (the "Opposition") (Dkt. 1830-11), and the exhibits to
11 the Opposition sought to be filed under seal.

12 3. Tyto LiDAR and Sandstone Group are non-parties and are existing limited
13 liability companies. All of the information designated by Tyto LiDAR or Sandstone Group and
14 included in the Opposition was designated confidential. None of the information was designated
15 highly confidential/AEO by Tyto LiDAR or Sandstone Group.

16 4. The yellow highlighted portions of Defendants' Opposition contain confidential
17 information regarding the ownership and structure of non-party Sandstone Group, and, by
18 extension, the ownership and structure of non-party Tyto LiDAR. Because Sandstone Group and
19 Tyto LiDAR are non-parties and existing private companies, they request that their
20 confidentiality interests in this ownership information be respected in this proceeding.

21 5. Exhibit 4 to the Opposition consists of portions of the deposition of Maxime
22 Levandowski, taken in this action. Exhibit 4, at 168:3-10, contains confidential information
23 regarding the ownership and structure of non-party Sandstone Group, and, by extension, the
24 ownership and structure of non-party Tyto LiDAR. Because Sandstone Group and Tyto LiDAR
25 are non-parties and existing private companies, they request that their confidentiality interests in
26 this ownership information be respected in this proceeding.

27 6. Defendants' request to seal is narrowly tailored to those exhibits to Defendants'
28 Opposition that merit sealing.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 1st day of October, 2017 at San Francisco,
3 California.

4 /s/ Adrian J. Sawyer
5 ADRIAN J. SAWYER
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